

WHEREFORE, your Affirmant respectfully requests that the Motion for Judgment pursuant to Rule 56(c) by the defendants herein on the Affirmative Defense of qualified immunity be denied in its entirety, together with such other and further relief as to the Court may seem just and proper.

Dated: Poughkeepsie, NY
July 7, 2008



LEE DAVID KLEIN (LDK 2270)